

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Southern Division)

ASHLEY ALBERT, et al.

Plaintiffs,

v.

GLOBAL TEL*LINK CORP., et al.

Defendants.

Case No. 8:20-CV-1936-PWG

**STIPULATED MOTION TO EXTEND TIME TO RESPOND
AND PROPOSED BRIEFING SCHEDULE**

COME NOW Plaintiffs Ashley Albert, Ashley Baxter, Karina Jakeway, and Melinda Jabbie (“Plaintiffs”), together with Defendants Global Tel*Link Corp. (“GTL”), Securus Technologies, LLC (“Securus”), and 3CInteractive Corp. (“3CI”) (collectively, “Defendants”), by undersigned counsel, pursuant to Local Rules 105.2 and 105.9, and

HEREBY STIPULATE and JOINTLY MOVE for an order adopting the following schedule for answering or otherwise responding to the complaint in this action, and for briefing any motions filed pursuant to Rule 12, Fed. R. Civ. P.

<u>Event</u>	<u>Filed by</u>
• All Defendants’ responses to complaint	September 18, 2020
• Plaintiffs’ opposition(s) to Rule 12 motions	November 13, 2020
• Defendants’ replies in support of Rule 12 motions	December 11, 2020

All parties shall confer with respect to consolidating arguments and increasing efficiencies where practicable, and shall submit to the Court any joint proposals regarding page limits and organization of supporting memoranda.

Dated: July 20, 2020

Respectfully submitted,

BY COUNSEL FOR ALL PARTIES, by express written consent:

/s/ Matthew K. Handley

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* *pro hac vice* motion forthcoming

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SO ORDERED this _____ day of _____, 2020.

BY THE COURT:

Hon. Paul W. Grimm, U.S.D.J.